



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Arne W. Owens
Director
Virginia Department of Health Professions

FROM: James E. Rutkowski
Assistant Attorney General

DATE: November 7, 2022

SUBJECT: *Regulations Governing the Practice of Pharmacy*
18VAC110-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, which were adopted by the Board of Pharmacy on September 6, 2022. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400, 54.1-3307 and pursuant to 2022 Va. Acts. Ch. 628. Additionally, the Board has the authority to adopt this regulation as an emergency regulation pursuant to § 2.2-4011(B) of the Code of Virginia because the second enactment clause of Chapter 628 of the 2022 Acts of Assembly requires, "That the Board of Pharmacy shall promulgate regulations to implement the provisions of this act to be effective within 280 days of its enactment." The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.